

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

ROBERT J. LABONTE,

Plaintiff,

v.

UNITED STATES,

Defendant.

No. 18-1784C

(Judge Hertling)

**PLAINTIFF’S UNOPPOSED MOTION FOR AN
ENLARGEMENT OF TIME TO REPLY TO THE GOVERNMENT’S RESPONSE TO
PLAINTIFF’S CROSS-MOTION TO COMPLETE AND SUPPLEMENT THE
ADMINISTRATIVE RECORD**

Pursuant to Rule 6(b)(1)(A) of this Court’s Rules, Plaintiff Robert J. LaBonte, Jr. respectfully requests that the Court grant a 14-day enlargement of time, from September 4, 2019 to and including September 18, 2019, to file Mr. LaBonte’s reply to Defendant’s response to plaintiff’s Cross-Motion to Complete and Supplement the Administrative Record. This is Plaintiff’s first request for an enlargement of time for this purpose. Plaintiff previously received an additional 23-day enlargement in this case, for his response to Defendant’s motion to dismiss. On August 28, 2019, Defendant’s counsel advised that Defendant consents to the proposed enlargement of time.

Plaintiff requests this extension so as to allow sufficient time to address the unusual factual and legal contentions at issue in the cross-motion, and to accommodate the transition from summer law student interns to term-time law student interns, who have just returned to campus for the start of classes. Plaintiff is represented *pro bono* by the Veterans Legal Services Clinic at Yale Law School.

For these reasons, Plaintiff respectfully requests that the Court grant this consent motion for a 14-day enlargement of time, to and including September 18, 2019.

Dated: August 29, 2019

Respectfully Submitted,

By: /s/ Michael J. Wishnie

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